

IN RE: CHRISTY MARIE STINEBERT, : CHAPTER 13
Debtor :
 :
JACK N. ZAHAROPOULOS, :
STANDING CHAPTER 13 TRUSTEE, : CASE NO. 1:24-bk-02254-HWV
Movant :
 :
vs. :
 :
CHRISTY MARIE STINEBERT, :
Respondent :

AND NOW, this 21st day of February, 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

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WHEREFORE, the Trustee alleges and avers that the Debtor's Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos,
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 21st day of February, 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Chad J. Julius, Esquire
Jacobson, Julius & Harshberger
8150 Derry Street
Harrisburg, PA 17111-5212

/s/Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee